

## **Youth Program Elements Webinar: Questions and Answers**

### **1. Do all program elements need to be offered to youth or just one?**

Local programs must make each of the 14 program elements available to youth participants but may determine which program elements or services a youth receives based on that youth's objective assessment and individual service strategy.

Local programs are not required to use Title I-B Youth funds for all the program elements. Local programs may leverage partner resources to provide some of the readily available program elements, provided that --

- The local program has an agreement in place with the partner organization to ensure that the program element will be offered; and
- The local workforce development board ensures that the program element is closely connected and coordinated with the Title I-B Youth program.

(20 C.F.R. §§ 681.460 and 681.470)

### **Paid and Unpaid Work Experience**

### **2. Can the contextual learning or education component of the work experience be delivered virtually?**

Yes, the education component of the work experience may be delivered via electronic means, using video conferencing platforms such as Zoom or Skype or through online classes.

In addition, as the workplace includes remote and virtual settings, the work experience itself, when appropriate, may be conducted through electronic means.

### **3. Must summer employment opportunities be in in-demand occupations?**

State policy, federal regulations, and Training and Employment Guidance Letter (TEGL) 21-16 do not require that summer employment opportunities be in-demand occupations. However, it may be beneficial for youth as well as business partners when youth participants are placed in summer or other employment opportunities in in-demand occupations, when appropriate. Ultimately the work experience should help youth participants meet their goal and be consistent with the youths' individual service strategy.

### **4. Do summer employment opportunities include leadership development opportunities, occupational skills training, etc. as mentioned in the State policy?**

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Although there may be overlap of activities under individual program elements as they are described in the regulations and [TEGL 21-16](#), duplication in reporting should be avoided. Leadership development opportunities, occupational skills training, etc. must be reported under their respective program elements.

**5. Why is on-the-job training (OJT) listed under work experience when work experiences are individual services while OJT are training services?**

WIOA and its [regulations](#) identify OJT opportunities as a type of work experience for [Youth program](#) participants. However, as noted in the question above, WIOA and its [regulations](#) categorize OJT as a type of training service for Adult and Dislocated Worker program participants.

**6. Per State policy, the work experience agreement must include health and safety standards. Can you explain this?**

Health and safety standards that apply to the working conditions of WIOA participants are described in [20 C.F.R. 683.280](#).

Additional resources: [Occupational Safety and Health Administration](#)  
[Industrial Commission of Arizona: Workers' Compensation Information](#)

### **Education Offered Concurrently with Workforce Preparation and Training for a Specific Occupation**

**7. What are some examples of education offered concurrently with workforce preparation and training for a specific occupation and how the services can be provided all at the same time?**

[TEGL 21-16](#) describes this program element as the concurrent delivery of services that generally would be provided under alternative school services or dropout recovery services (program element 2), paid and unpaid work experience (program element 3), and occupational skills training (program element 4).

The following is an example of a participant who receives education offered concurrently with workforce preparation and training for a specific occupation: The youth is enrolled in an IBEST program, participating in the IT support technician training while working on a high school equivalency. While completing the online IT support technician training, the youth is also placed in job shadowing with a local technology company to learn about the information (technology) industry, soft skills in the workplace, etc.

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## Leadership Development Opportunities

- 8. Can Youth programs pay wages/stipends for participants in leadership development opportunities (e.g., a summer community and service-learning project in which participants create an art mural at a local community center) just as they do for work experience?**

State Youth policy (p. 15) identifies “wages/stipends” paid to youth for participating in work experience as allowable work experience expenditures. However, the policy does not prohibit local Youth programs from paying stipends to youth participants for engaging in activities reported under other program elements. (Nor can State policy prohibit the payment of wages when required by law, i.e., when an employee-employer relationship exists).

Local areas must have policies addressing when wages or stipends are paid to Youth program participants, consistent with State and federal guidance.

For additional information on wages or stipends paid to Youth program participants, please also refer to Forms of Payments for WIOA Youth Program Participants.

## Follow-up Services

- 9. If youth opt out of follow-up services, will this impact performance?**

Receipt of follow-up services is not a performance indicator; thus, a youth opting out of follow-up services will technically not impact the local area/State performance.

Employment or education/training in the second and fourth quarter after exit and credential attainment rate, however, are performance indicators for the Youth program. Follow-up services are provided to help ensure that participants are successful in their employment or postsecondary education/training. Thus, not receiving follow up services may indirectly impact performance when it becomes a determinant of the youth’s success in employment or education/training.

In addition, it may be necessary to communicate to youth who opt out of follow-up services that post-exit contact may still occur to secure information and documentation for the purpose of performance reporting.

- 10. When service providers contact youth, is it appropriate to ask if the youth is employed and/or attending school and in need of any services? Based**

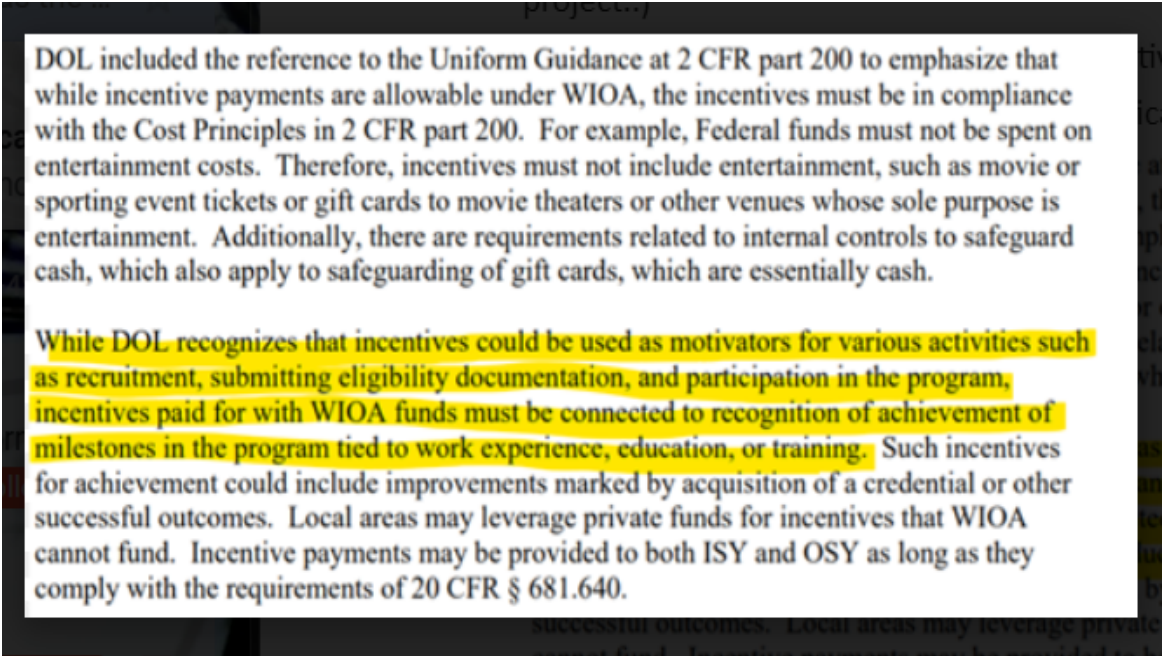
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**on the youth's response, the program will provide follow-up services available to the youth.**

While TEGL 21-16 states that follow-up services “must include more than only a contact attempted or made for securing documentation in order to report a performance outcome,” asking about the youth's employment or school status and ascertaining any services the youth needs go beyond the contact described in the TEGL.

Please note that if the youth needs services other than follow-up services, such as those program elements that may not be provided as follow-up services, local programs must make those services available to the youth. This could delay the youth's exit date or would require the youth to undergo eligibility determination again, if 90 days had passed since the last service date.

- 11. Are programs allowed to pay incentives to youth for recruiting other youth? TEGL 21-16 states the following; however, we want to obtain clarification on this.**

A screenshot of a document with a white background and black text. The text discusses the use of incentives under WIOA. The first paragraph states that while incentive payments are allowable, they must comply with the Cost Principles in 2 CFR part 200, specifically that federal funds cannot be spent on entertainment costs like movie tickets or gift cards. The second paragraph, which is highlighted in yellow, states that incentives must be connected to the recognition of achievement of milestones in the program tied to work experience, education, or training. The third paragraph explains that such incentives could include improvements marked by the acquisition of a credential or other successful outcomes, and that local areas may leverage private funds for incentives that WIOA cannot fund. The final sentence states that incentive payments may be provided to both ISY and OSY as long as they comply with 20 CFR § 681.640.

DOL included the reference to the Uniform Guidance at 2 CFR part 200 to emphasize that while incentive payments are allowable under WIOA, the incentives must be in compliance with the Cost Principles in 2 CFR part 200. For example, Federal funds must not be spent on entertainment costs. Therefore, incentives must not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment. Additionally, there are requirements related to internal controls to safeguard cash, which also apply to safeguarding of gift cards, which are essentially cash.

While DOL recognizes that incentives could be used as motivators for various activities such as recruitment, submitting eligibility documentation, and participation in the program, incentives paid for with WIOA funds must be connected to recognition of achievement of milestones in the program tied to work experience, education, or training. Such incentives for achievement could include improvements marked by acquisition of a credential or other successful outcomes. Local areas may leverage private funds for incentives that WIOA cannot fund. Incentive payments may be provided to both ISY and OSY as long as they comply with the requirements of 20 CFR § 681.640.

Per the highlighted section of TEGL 21-16 (above), incentives provided to youth participants using WIOA Title I-B Youth program funds must be connected to the achievement of milestones in the program tied to work experience, education, or training.

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Further, and as referenced in TEGL 21-16, federal regulations under 20 C.F.R. § 681.640 require that local programs have written policies and procedures on awarding incentives and ensure that incentive payments are (a) tied to the goals of the specific program, (b) outlined in writing before the start of the program that may provide the incentive, (c) align with the local program's organizational policies, and (d) are accordance with 2 C.F.R. part 200.

For additional information, please also refer to the State policy on incentives.

### **12. What is the average time Statewide for a participant to be enrolled in Youth program services?**

Among WIOA Youth program “exitors,” with exit dates between 10/1/2020 and 9/30/2021:

- Statewide average length of Youth program participation: 368.1 days
  - Formula: Exit Date - Participation Date
- Statewide average length of time between Youth program enrollment date and participation date: 6.6 days
  - Formula: Participation Date - Enrollment Date

Please note that local programs must provide services to youth participants for the amount of time necessary to ensure successful preparation to enter postsecondary education and/or unsubsidized employment. There is no minimum or maximum time a youth can participate in the Title I-B Youth program (20 CFR § 681.450).